



**Troy A. Bauer**  
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December 08, 2020

Mr. Terence Eng, P.E.  
Program Manager, Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Ave, 2nd Floor  
San Francisco, CA 94102

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a **General Order (G.O.)112-F Inspection of San Diego Gas and Electric Company (SDG&E)'s Operator Qualification (OQ) Program** on October 5 through October 9, 2020 for calendar years 2016 through 2019. SED conducted a remote review of SDG&E's OQ program procedures and records due to COVID-19 and California Governor Newsom's Executive Order N-33-20 shelter in place and social distancing guidelines ("Safer at Home, Stay at Home").

SED staff identified one (1) area of concern. Attached are SoCalGas' written responses.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Troy A. Bauer', with a long horizontal flourish extending to the right.

Troy A. Bauer  
Pipeline Safety and Compliance Manager

CC:  
Dan Rendler, SoCalGas  
Mahmoud Intably, SED  
Kan-Wai Tong, SED  
James Zhang, SED  
Claudia Almengor, SED

**2020 SDG&E Operator Qualifications Audit**  
**10/5/2020 to 10/9/2020**

**Concern(s)**

1. On October 8, 2020, SED and SDG&E discussed the review process for Assisting Parties (AP) standards used in the qualification of AP personnel. SDG&E stated that the review process would involve SDG&E's OQ Department to consult with subject matter experts (SMEs) in assessing the acceptability of AP standards. While the intent of this process is as written, the details of how this review process is not elaborated upon as written in Gas Standard G8113.

Of chief concern to SED is the matter of properly evaluating AP personnel with regards to SDG&E's benchmark for qualification. While AP personnel may have general knowledge, skills, and abilities to be qualified through the AP's evaluation process, this does not automatically entail AP personnel as having been evaluated through SDG&E's process. For comparison, contractors are qualified through a training and evaluation process run by SDG&E's OQ vendor, Veriforce, as elaborated upon under G8113 § 4.7.5. AP personnel, on the other hand, are trained on SDG&E standards but not evaluated based on SDG&E evaluation process as written in G8113 § 3.8.

**SDG&E Response:**

SDG&E has revised Gas Standard G8113, which includes added verbiage to section 4.8.1 9 (Mutual Assistance) stating, *"If the requirements in Section 4.8.1 are not met, the company will require evaluations for the Mutual Assistance employees to meet requirements of Section 4.1 within Gas Standard G8113."*

*As stated in Section 4.1*, training, as appropriate, is provided to the individuals performing covered tasks. Evaluation methods are used to evaluate an individual's knowledge, skills, and ability to perform the safe operation of pipeline facilities. The requirements of the knowledge and performance exams are identified.

An evaluator from SDG&E's Operator Qualification Department (SME) is identified as one with technical knowledge and capability to ascertain an individual's ability to perform a covered task as well as an individual's ability to recognize and react to abnormal operating conditions. The SDG&E's Operator Qualification subject matter experts (SMEs) will assess the acceptability of AP standards when Mutual Assistance is required.